

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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DOVER LIMITED,

Plaintiff,

-against-

ALAIN ASSEMI, HARTSFIELD CAPITAL
SECURITIES, INC., HARTSFIELD CAPITAL
GROUP, STEPHEN J. LOVETT,
JOHN H. BANZAF, DELBERT D. REICHARDT,
MANSELL CAPITAL PARTNERS, LLC,
THOMAS O. BEGLEY & ASSOCIATES,
TJ MORROW and TJ MORROW PC,

Defendants.
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: 08 CV 1337 (LTS)(JCF)
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: **AFFIDAVIT OF**
: **JOHN H. BANZAF**
:

STATE OF GEORGIA)
) SS.
COUNTY OF FULTON)

JOHN H. BANZAF, being duly sworn, deposes and says:

1. I am one of the defendants in this action and am fully familiar with the facts set forth in this affidavit.

2. I am the President and Chief Executive Officer of Argosy Capital Securities, Inc. ("Argosy"), formerly known as Hartsfield Capital Securities, Inc. ("HCS").

3. Argosy, as well as HCS, is or was, respectively, a Georgia corporation engaged in the business of providing financial services primarily to institutional investors.

4. HCS began, sometime early in 1998, when I, along with Delbert D. Reichardt, had discussions with Mr. Steve Lovett, President of Hartsfield Capital Group,

with respect to the formation of a broker-dealer to provide broker-dealer services to clients of Hartsfield Capital Group and others.

5. As a result, in 1998, I and Delbert D. Reichardt founded HCS, as a separate entity, with the intent of providing certain broker-dealer services to clients of Hartsfield Capital Group and others.

6. Other than the fact that HCS has leased office space from Hartsfield Capital Group, HCS has no legal relationship with Hartsfield Capital Group whatsoever.

7. In response to one of the Plaintiff's allegations, HCS never had an agreement with the Plaintiff to provide investment services, nor has it ever received investments from Plaintiff.

8. I have never resided in the State of New York

9. While HCS (or Argosy) has been registered to do business in the State of New York, it has never done so, and neither I nor HCS (or Argosy) conduct any business in the State of New York.

10. Neither I nor HCS (or Argosy) maintain any bank accounts in the State of New York or solicit any business in the State of New York.

11. Neither I nor HCS (or Argosy) maintain any offices or presence in the State of New York.

12. Neither I nor HCS (or Argosy) have committed any act in New York relating to the claims alleged by Plaintiff in its Complaint. I have never met TJ Morrow or had any dealings with him or his company.

13. Specifically, in its Complaint, the Plaintiff references a business meeting in New York. I neither attended nor participated in that meeting in any fashion.

14. Neither I nor HCS (or Argosy) have committed any act outside New York that could have injured any party or property located in the State of New York.

15. Neither I nor HCS (or Argosy) have any continuous or systematic contacts with the State of New York. All securities trades executed on the New York Stock Exchange are conducted by our clearing firm in Omaha, Nebraska.

Sworn to before me this
1st day of June, 2008


Notary Public

Nadia Simmon
Notary Public, Cobb County Georgia
My Commission Expires June 6 2011

